



*Consulting Engineers
and Scientists*

PASTOR, BEHLING & WHEELER, LLC
2201 Double Creek Drive, Suite 4004
Round Rock, TX 78664

Tel (512) 671-3434
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August 12, 2008
(PBW Project No. 1432)

VIA OVERNIGHT COURIER

Mr. Gary Miller
Superfund Division, Region 6 (6SF-AP)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: July 2008 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
 - Subtask 6.5 – Analyses of groundwater samples collected from one Zone B monitoring well (NE4MW31B), one Zone C monitoring well (NE4MW32C) and ten Zone A monitoring wells in June were completed. Validation of these analytical data was partially completed. Based on the monitoring well NE4MW32C data and per e-mail messages between you and me on July 23, re-sampling of this monitoring well and sampling of four Zone C piezometers (NG3CPT1, NE4CPT2, NC2CPT3, and OCPT4) was performed. Laboratory vertical hydraulic conductivity testing of three soil samples collected from borings NE4MW32C and SE1DB01 was completed. Water levels were measured in Zone B and C monitoring wells/piezometers on July 30, 2008. Investigation-derived wastes (auger cuttings/drilling mud) from borings NE4MW31B, NE4MW32C, and SE1DB01 were profiled and disposed off-site at the McCarty Road facility.

- Subtask 6.7 – Laboratory analyses of wetlands sediment samples collected from the 0 to 0.5 foot depth interval at three locations (4WSED1 through 4WSED3) and from the 1 to 2 foot depth interval at two locations (2WSED8 and 2WSED 10) were performed.
 - Subtask 6.9 – A draft Nature and Extent Data Report (NEDR) is currently being prepared.
 - Risk Assessment activities (SOW Paragraphs 37) detailed under Task 7 of the RI/FS Work Plan - data analysis, human health risk evaluation and ecological risk evaluation were partially completed.
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:
- Laboratory vertical hydraulic conducting testing reports for the soil samples described above are provided in Attachment A.
 - Waste profile forms/manifests for the off-site disposal of investigation-derived wastes described above are provided in Attachment B.
 - Water levels measured in Zone B and Zone C monitoring wells/piezometers on July 30, 2008, and calculated water level elevations are provided in Attachment C.
 - Field measurements collected during groundwater sampling are provided in Attachment D.
 - Unvalidated analytical laboratory reports for the groundwater sample analyses described above are provided in electronic form on the enclosed DVD.
 - A validation report for the groundwater analyses described above is provided in electronic form on the enclosed DVD.
 - Unvalidated analytical laboratory reports for the wetland sediment sample analyses described above are provided in electronic form on the enclosed DVD.
 - The updated database, including all data validated through July 31, 2008, is provided in electronic format on the enclosed DVD.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
- RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:

- Subtask 6.5 – Groundwater/NAPL investigation – to be continued through groundwater sample analyses, data validation, and data evaluation.
 - Subtask 6.9 – Preliminary Site Characterization Report – to be continued through Draft NEDR preparation.
 - Risk Assessment activities (SOW Paragraphs 37) detailed under Task 7 of the RI/FS Work Plan – to be continued through data analysis, human health risk evaluation and ecological risk evaluation.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 75% complete. No delays were encountered this month.

Thank you for the opportunity to submit this status report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology
Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Rob Rouse - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLC

ATTACHMENT A

**LABORATORY VERTICAL HYDRAULIC CONDUCTIVITY
TESTING REPORTS**



3601 Manor Road
Austin, Texas 78723
P/(512) 926-6650
F/(512) 926-3312
www.kleinfelder.com

FALLING HEAD, RISING TAILWATER FLEXIBLE WALL PERMEABILITY TEST

Client: P.B.W., LLC
Project: Gulfco Marine Superfund Site

Project No.: 95194
Control No.: 070709

Tested by: Corpus Christi
Report Date: 7/2/2008

Sample No.: G-1998 #1 53'-55'
Description: Tan & Gray Clay
Location: NE4MW32C
Test Method: Corps of Engineer's Manual
EM-1110-2-1906 Appendix VII

Sample Type: 2"
Shelby Tube
Permeant: Tap Water

Final Moisture Content From Trimmings

Wt. of Can (gm)	53.48
Wt. of Can and Wet Soil (gm)	506.08
Wt. of Can and Dry Soil (gm)	383.66
Water Content (%)	37.1

Test Conditions

Inflow Pressure (psi)	10.0
Outflow Pressure (psi)	0.0
Cell Pressure (psi)	15.0
Inflow Pipette Area (cm ²)	0.8993
Outflow Pipette Area (cm ²)	0.8993

Sample Characteristics

	Initial	Final		Initial	Final
Total Weight (gm)	448.40	452.60	Volume (cc)	238.60	238.60
Diameter (cm)	7.00	7.00	Moisture Content (%)	35.8	37.1
Height (cm)	6.20	6.20	Void Ratio	0.99	0.99
			Saturation (%)	100	103
Specific Gravity (approx.)	2.75		Total Unit Wt. (pcf)	117.3	118.4
Dry Weight (gm)	330.18		Dry Unit Wt. (pcf)	86.3	86.3

Initial						Final						Elapsed	Total	Total	Outflow	Hydraulic
Day	Time	Temp (°C)	Inflow Reading	Outflow Reading	Head (cm)	Day	Time	Temp (°C)	Inflow Reading	Outflow Reading	Head (cm)	Time (s)	Inflow (cc)	Outflow (cc)	Inflow O/I	Conductivity (cm/s)
169	13:05	23.6	85.0	64.8	680.9	169	16:42	23.4	84.0	64.8	682.1	13020	0.90	0.00	0.00	8.34E-09
169	16:42	23.4	84.0	64.8	682.1	170	08:02	26.6	82.0	66.2	685.8	55200	1.80	1.26	0.70	6.40E-09
171	16:54	21.3	77.9	69.6	694.2	172	07:41	27.1	76.3	71.6	698.2	53220	1.44	1.80	1.25	7.06E-09
178	17:09	23.6	77.6	70.0	694.9	179	07:42	28.0	75.9	71.9	699.0	52380	1.53	1.71	1.12	6.85E-09
179	07:42	28.0	75.9	71.9	699.0	179	16:31	29.2	74.7	72.8	701.3	31740	1.08	0.81	0.75	6.04E-09
179	16:31	29.2	74.7	72.8	701.3	182	15:52	22.7	66.2	81.2	720.1	256860	7.64	7.55	0.99	6.40E-09
182	15:53	22.7	85.1	58.7	674.0	183	07:45	28.2	83.5	60.9	678.3	57120	1.44	1.98	1.38	6.90E-09

Hydraulic Conductivity at 20 ° C, cm/s (average of the last 4 readings)
Average Hydraulic Gradient

6.55E-09
112

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Mark Holcomb
Mark Holcomb, CET



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Austin, Texas 78723
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FALLING HEAD, RISING TAILWATER FLEXIBLE WALL PERMEABILITY TEST

Client: P.B.W., LLC.
Project: Gulfco Marine Superfund Site

Project No.: 95194
Control No.: 070710

Tested by: Corpus
Report Date: 7/2/2008

Sample No.: G-1998 #2 55'-57'
Description: Tan & Gray Clay
Location: NE4MW32C
Test Method: Corps of Engineer's Manual
EM-1110-2-1906 Appendix VII

Sample Type: 2"
Shelby Tube
Permeant: Tap Water

Final Moisture Content From Trimming:	
Wt. of Can (gm)	54.86
Wt. of Can and Wet Soil (gm)	519.96
Wt. of Can and Dry Soil (gm)	379.14
Water Content (%)	43.4

Test Conditions

Inflow Pressure (psi)	10.0
Outflow Pressure (psi)	0.0
Cell Pressure (psi)	15.0
Inflow Pipette Area (cm ²)	0.8532
Outflow Pipette Area (cm ²)	0.8621

Sample Characteristics

	Initial	Final		Initial	Final
Total Weight (gm)	462.10	465.10	Volume (cc)	250.15	254.00
Diameter (cm)	7.00	7.00	Moisture Content (%)	42.5	43.4
Height (cm)	6.50	6.60	Void Ratio	1.12	1.15
			Saturation (%)	104	103
Specific Gravity (approx.)	2.75		Total Unit Wt. (pcf)	115.3	114.3
Dry Weight (gm)	324.28		Dry Unit Wt. (pcf)	80.9	79.7

Initial						Final						Elapsed	Total	Total	Outflow	Hydraulic
Day	Time	Temp (°C)	Inflow Reading	Outflow Reading	Head (cm)	Day	Time	Temp (°C)	Inflow Reading	Outflow Reading	Head (cm)	Time (s)	Inflow (cc)	Outflow (cc)	Inflow O/I	Conductivity (cm/s)
169	13:06	23.6	85.3	64.5	679.0	169	16:43	23.4	84.4	64.6	680.2	13020	0.77	0.09	0.11	8.84E-09
169	16:43	23.4	84.4	64.6	680.2	170	08:03	26.5	82.0	66.0	684.6	55200	2.05	1.21	0.59	7.58E-09
171	16:54	21.4	78.1	68.3	691.9	172	07:42	27.1	76.7	69.9	695.4	53280	1.19	1.38	1.15	6.22E-09
178	17:09	23.6	67.5	71.3	707.9	179	07:41	28.0	66.2	73.0	711.4	52320	1.11	1.47	1.32	5.93E-09
179	07:41	28.0	66.2	73.0	711.4	179	16:32	29.2	65.3	73.7	713.2	31860	0.77	0.60	0.79	4.76E-09
179	16:32	29.2	65.3	73.7	713.2	182	15:54	22.7	58.1	80.6	729.8	256920	6.14	5.95	0.97	5.56E-09
182	15:55	22.7	85.1	57.2	670.7	183	07:46	28.2	83.8	59.2	674.6	57060	1.11	1.72	1.55	6.37E-09

Hydraulic Conductivity at 20 ° C, cm/s (average of the last 4 readings)
Average Hydraulic Gradient

5.66E-09
107

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FALLING HEAD, RISING TAILWATER FLEXIBLE WALL PERMEABILITY TEST

Client: P.B.W., LLC
Project: Gulfco Marine Superfund Site

Project No. 95194
Control No.: 071421

Tested by: Corpus Christi
Report Date: 7/14/2008

Sample No. G-2006
Description: Gray Clay
Location: SEIDBOI, 80-82 feet
Test Method: Corps of Engineer's Manual
EM-1110-2-1906 Appendix VII

Sample Type: 2"
Shelby Tube
Permeant: Tap Water

Final Moisture Content From Trimmings

Wt. of Can (gm)	53.02
Wt. of Can and Wet Soil (gm)	512.60
Wt. of Can and Dry Soil (gm)	383.60
Water Content (%)	39.0

Test Conditions

Inflow Pressure (psi)	10.0
Outflow Pressure (psi)	0.0
Cell Pressure (psi)	15.0
Inflow Pipette Area (cm ²)	0.8993
Outflow Pipette Area (cm ²)	0.8993

Sample Characteristics

	Initial	Final		Initial	Final
Total Weight (gm)	456.40	459.60	Volume (cc)	249.43	249.43
Diameter (cm)	7.10	7.10	Moisture Content (%)	38.1	39.0
Height (cm)	6.30	6.30	Void Ratio	1.07	1.07
			Saturation (%)	97	100
Specific Gravity (approx.)	2.75		Total Unit Wt. (pcf)	114.2	115.0
Dry Weight (gm)	330.58		Dry Unit Wt. (pcf)	82.7	82.7

Initial						Final						Elapsed	Total	Total	Outflow	Hydraulic
Day	Time	Temp (°C)	Inflow Reading	Outflow Reading	Head (cm)	Day	Time	Temp (°C)	Inflow Reading	Outflow Reading	Head (cm)	Time (s)	Inflow (cc)	Outflow (cc)	Inflow O/I	Conductivity (cm/s)
183	10:51	22.3	85.5	59.3	674.3	183	16:56	21.6	63.6	80.3	722.0	21900	19.69	18.89	0.96	2.14E-07
184	12:13	21.2	85.2	59.2	674.5	184	14:00	21.3	82.4	61.7	680.4	6420	2.52	2.25	0.89	9.44E-08
190	16:49	24.7	68.5	76.8	712.6	191	07:51	25.4	64.2	81.2	722.3	54120	3.87	3.96	1.02	1.57E-08
191	07:51	25.4	64.2	81.2	722.3	191	17:12	24.5	61.6	83.5	727.8	33660	2.34	2.07	0.88	1.41E-08
191	17:13	24.5	85.7	58.8	673.5	192	08:46	24.2	81.1	63.9	684.3	55980	4.14	4.59	1.11	1.82E-08
192	08:46	24.2	81.1	63.9	684.3	192	16:45	23.5	78.6	66.0	689.4	28740	2.25	1.89	0.84	1.69E-08
192	16:45	23.5	78.6	66.0	689.4	193	07:14	28.6	74.6	70.7	699.1	52140	3.60	4.23	1.18	1.64E-08

Hydraulic Conductivity at 20 ° C, cm/s (average of the last 4 readings)
Average Hydraulic Gradient

1.64E-08
110

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Mark Holcomb, CET

ATTACHMENT B
INVESTIGATION-DERIVED WASTE
PROFILE FORMS/MANIFESTS



GENERATOR WASTE PROFILE SHEET

Page 1 of 2

Requested Disposal Facility: MCCARTY
an Allied Waste Company

Waste Profile # <u>653488631</u>
AWI Sales Rep: <u>T. Banner/102</u>
Date: 7-15-08

I. Generator Information

Generator Name: LDL Coastal, L.P.			
Generator Site Address: 906 Marlin			
City: Freeport	County: Brazoria	State: TX	Zip: 77541
State ID/Reg No: N/A	State Approval/Waste Code: N/A (if applicable)		SIC Code:
Generator Mailing Address (if different): 6363 Woodway Drive Suite 730			
City: Houston	County: Harris	State: TX	Zip: 77057
Generator Contact Name: Allan B. Daniels			
Phone Number: (713) 626-0299		Fax Number: (713) 626-0276	

IIa. Transporter Information

Transporter Name: Bayou City Env. Services		Contact Name: Bill Meyers	
Transporter Address: 10234 Lucore St.			
City: Houston	County: Harris	State: TX	Zip: 77017
Phone Number: (713) 425-6900	Fax Number: (713) 425-6958	State Transportation Number: 86133	

IIb. Billing Information

Bill To: USA Environment, LP		Contact Name: Siobhan LeRoy	
Billing Address: P.O. Box 87687			
City: Houston	State: TX	Zip: 77287	Phone Number: (713) 425-6901

III. Waste Stream Information

Name of Waste: Drill Cuttings	
Process Generating Waste: Investigation (Installation of monitor wells) at site near former marine maintenance facility. Contaminant of concern is diesel.	
Type of Waste	<input type="checkbox"/> INDUSTRIAL PROCESS WASTE or <input checked="" type="checkbox"/> POLLUTION CONTROL WASTE
Physical State:	<input type="checkbox"/> SOLID <input checked="" type="checkbox"/> SEMI-SOLID <input type="checkbox"/> POWDER <input type="checkbox"/> LIQUID <input type="checkbox"/> OTHER: _____
Method of Shipment:	<input checked="" type="checkbox"/> BULK <input type="checkbox"/> DRUM <input type="checkbox"/> BAGGED <input type="checkbox"/> OTHER: _____
Estimated Annual Volume:	<input checked="" type="checkbox"/> CUBIC YARDS: 10 <input type="checkbox"/> TONS: _____ <input type="checkbox"/> GALLONS: _____ <input type="checkbox"/> OTHER: _____
Frequency:	<input checked="" type="checkbox"/> ONE TIME <input type="checkbox"/> DAILY <input type="checkbox"/> WEEKLY <input type="checkbox"/> MONTHLY <input type="checkbox"/> OTHER: _____
Special Handling Instructions: _____	

IV. Representative Sample Certification☐ NO SAMPLE TAKEN

Is the representative sample collected to prepare this profile and laboratory analysis, collected in accordance with U.S. EPA 40 CFR 261.20(c) guidelines or equivalent rules?		<input checked="" type="checkbox"/> YES or <input type="checkbox"/> NO
Sample Date: 7-1-08	Type of Sample: <input type="checkbox"/> COMPOSITE SAMPLE <input checked="" type="checkbox"/> GRAB SAMPLE	
Laboratory: Xenco	Sample ID Numbers: 307042-002	
Sampler's Employer: USA Environment		
Sampler's Name (printed): Jerry Vega	Signature: <u>Jerry Vega</u>	



GENERATOR WASTE PROFILE SHEET (continued)

Page 3 of 2

Waste Profile #
LS3Y88631

V. Physical Characteristics of Waste

Characteristic Components		% by Weight (range)				
1. Drill Cuttings		100% 95% SL				
2. Tap Water		5% 11/18/08				
3.						
4.						
5.						
Color	Odor (describe)	Free Liquids <input checked="" type="checkbox"/> YES or <input type="checkbox"/> NO Content 5%	% Solids	pH:	Flash Point	Phenol
Brown	none		95	ND	ND <input type="checkbox"/> F	0 ppm
Attach Laboratory Analytical Report (and/or Material Safety Data Sheet) Including Required Parameters Provided for this Profile						
Does this waste or generating process contain regulated concentrations of the following Pesticides and/or Herbicides: Chlordane, Endrin, Heptachlor (and it epoxides), Lindane, Methoxychlor, Toxaphene, 2,4-D, or 2,4,5-TP Silvex as defined in 40 CFR 261.33?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Does this waste or generating process cause it to exceed OSHA exposure limits from high levels of Hydrogen Sulfide or Hydrogen Cyanide as defined in 40 CFR 261.23?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Does this waste contain regulated concentrations of Polychlorinated Biphenyls (PCBs) as defined in 40 CFR Part 761?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Does this waste contain regulated concentrations of listed hazardous wastes defined in 40 CFR 261.31, 261.32, 261.33, including RCRA F-Listed Solvents?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Does this waste contain regulated concentrations of 2,3,7,8-Tetrachlorodibenzodioxin (2,3,7,8-TCDD), or any other dioxin as defined in 40 CFR 261.31?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Is this a regulated Toxic Material as defined by Federal and/or State regulations?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Is this a regulated Radioactive Waste as defined by Federal and/or State regulations?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Is this a regulated Medical or Infectious Waste as defined by Federal and/or State regulations?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Is this waste generated at a Federal Superfund Clean Up Site?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No

VI. Generator Certification

I hereby certify that to the best of my knowledge and belief, the information contained herein is a true, complete and accurate description of the waste material being offered for disposal and all known or suspected hazards have been disclosed. All Analytical Results/Material Safety Data Sheets submitted are truthful and complete and are representative of the waste. I further certify that by utilizing this profile, neither myself nor any other employee of the company will deliver for disposal or attempt to deliver for disposal any waste which is classified as toxic waste, hazardous waste or infectious waste, or any other waste material this facility is prohibited from accepting by law. I shall immediately give written notice of any change or condition pertaining to the waste not provided herein. Our company hereby agrees to fully indemnify this disposal facility against any damages resulting from this certification being inaccurate or untrue. I further certify that the company has not altered the form or content of this profile sheet as provided by Allied Waste.

Siohan Le Roy, CSR USA Environment LP
 Authorized Representative Name And Title (Printed) Company Name
Siohan Le Roy 7/18 108
 Authorized Representative Signature Date

VII. Allied Waste Decision

<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Rejected	Expiration: <u>10/31/08</u>
Conditions: Waste containing free liquid or failing the paint filter test must be solidified immediately upon receipt at the landfill facility. Once the material is able to pass a paint filter test, it is acceptable for landfill disposal. Proper PPE must be worn when handling this material.		
Keith Diamanti, Special Waste Analyst <u>7/22/08</u> Name, Title Signature Date		



GENERATOR WASTE PROFILE SHEET

Page 1 of 2

Requested Disposal Facility: MCCARTY
an Allied Waste Company

Waste Profile # <u>L53788630</u>
AWI Sales Rep: <u>T. Garza/102</u>
Date: 7-15-08

I. Generator Information

Generator Name: <u>LDL Coastal, L.P.</u>			
Generator Site Address: <u>906 Marlin</u>			
City: <u>Freeport</u>	County: <u>Brazoria</u>	State: <u>TX</u>	Zip: <u>77541</u>
State ID/Reg No: <u>N/A</u>	State Approval/Waste Code: <u>N/A</u> (if applicable)		SIC Code:
Generator Mailing Address (if different): <u>6363 Woodway Drive Suite 730</u>			
City: <u>Houston</u>	County: <u>Harris</u>	State: <u>TX</u>	Zip: <u>77057</u>
Generator Contact Name: <u>Allen B. Daniels</u>			
Phone Number: <u>(713) 626-0299</u>		Fax Number: <u>(713) 626-0276</u>	

IIa. Transporter Information

Transporter Name: <u>Bayou City Env. Services</u>		Contact Name: <u>Bill Meyers</u>	
Transporter Address: <u>10234 Lucore St.</u>			
City: <u>Houston</u>	County: <u>Harris</u>	State: <u>TX</u>	Zip: <u>77017</u>
Phone Number: <u>(7) 425-6900</u>	Fax Number: <u>(7) 425-6958</u>	State Transportation Number: <u>86133</u>	

IIb. Billing Information

Bill To: <u>USA Environment, LP</u>		Contact Name: <u>Slobhan LeRoy</u>	
Billing Address: <u>P.O. Box 87887</u>			
City: <u>Houston</u>	State: <u>TX</u>	Zip: <u>77287</u>	Phone Number: <u>(7) 425-6901</u>

III. Waste Stream Information

Name of Waste: <u>Soil Cuttings</u>			
Process Generating Waste: <u>Investigation at site near former marine maintenance facility. Contaminant of concern is diesel.</u>			
Type of Waste <input type="checkbox"/> INDUSTRIAL PROCESS WASTE or <input checked="" type="checkbox"/> POLLUTION CONTROL WASTE			
Physical State: <input checked="" type="checkbox"/> SOLID <input type="checkbox"/> SEMI-SOLID <input type="checkbox"/> POWDER <input type="checkbox"/> LIQUID <input type="checkbox"/> OTHER: _____			
Method of Shipment: <input checked="" type="checkbox"/> BULK <input type="checkbox"/> DRUM <input type="checkbox"/> BAGGED <input type="checkbox"/> OTHER: _____			
Estimated Annual Volume: <input checked="" type="checkbox"/> CUBIC YARDS: <u>20</u> <input type="checkbox"/> TONS: _____ <input type="checkbox"/> GALLONS: _____ <input type="checkbox"/> OTHER: _____			
Frequency: <input checked="" type="checkbox"/> ONE TIME <input type="checkbox"/> DAILY <input type="checkbox"/> WEEKLY <input type="checkbox"/> MONTHLY <input type="checkbox"/> OTHER: _____			
Special Handling Instructions: _____			

IV. Representative Sample Certification☐ NO SAMPLE TAKEN

Is the representative sample collected to prepare this profile and laboratory analysis, collected in accordance with U.S. EPA 40 CFR 261.20(c) guidelines or equivalent rules?		<input checked="" type="checkbox"/> YES or <input type="checkbox"/> NO
Sample Date: <u>7-1-08</u>	Type of Sample: <input type="checkbox"/> COMPOSITE SAMPLE <input checked="" type="checkbox"/> GRAB SAMPLE	
Laboratory: <u>Xenco</u>	Sample ID Numbers: <u>307042-001</u>	
Sampler's Employer: <u>USA Environment</u>		
Sampler's Name (printed): <u>Jerry Vega</u>		Signature: <u>Jerry Vega</u>



GENERATOR WASTE PROFILE SHEET (continued)

Page 2 of 2

Waste Profile #
L53Y88630

V. Physical Characteristics of Waste

Characteristic Components		% by Weight (range)				
1. soil cuttings						
2.						
3.						
4.						
5.						
Color	Odor (describe)	Free Liquids <input type="checkbox"/> YES or <input checked="" type="checkbox"/> NO	% Solids	pH	Flash Point	Phenol
Brown	none	Content %	100	ND	ND <input type="checkbox"/> F	0 ppm
Attach Laboratory Analytical Report (and/or Material Safety Data Sheet) Including Required Parameters Provided for this Profile						
Does this waste or generating process contain regulated concentrations of the following Pesticides and/or Herbicides: Chlordane, Endrin, Heptachlor (and it epoxides), Lindane, Methoxychlor, Toxaphene, 2,4-D, or 2,4,5-TP Silvex as defined in 40 CFR 261.33?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Does this waste or generating process cause it to exceed OSHA exposure limits from high levels of Hydrogen Sulfide or Hydrogen Cyanide as defined in 40 CFR 261.23?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Does this waste contain regulated concentrations of Polychlorinated Biphenyls (PCBs) as defined in 40 CFR Part 761?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Does this waste contain regulated concentrations of listed hazardous wastes defined in 40 CFR 261.31, 261.32, 261.33, including RCRA F-Listed Solvents?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Does this waste contain regulated concentrations of 2,3,7,8-Tetrachlorodibenzodioxin (2,3,7,8-TCDD), or any other dioxin as defined in 40 CFR 261.31?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Is this a regulated Toxic Material as defined by Federal and/or State regulations?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Is this a regulated Radioactive Waste as defined by Federal and/or State regulations?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Is this a regulated Medical or Infectious Waste as defined by Federal and/or State regulations?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Is this waste generated at a Federal Superfund Clean Up Site?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No

VI. Generator Certification

I hereby certify that to the best of my knowledge and belief, the information contained herein is a true, complete and accurate description of the waste material being offered for disposal and all known or suspected hazards have been disclosed. All Analytical Results/Material Safety Data Sheets submitted are truthful and complete and are representative of the waste. I further certify that by utilizing this profile, neither myself nor any other employee of the company will deliver for disposal or attempt to deliver for disposal any waste which is classified as toxic waste, hazardous waste or infectious waste, or any other waste material this facility is prohibited from accepting by law. I shall immediately give written notice of any change or condition pertaining to the waste not provided herein. Our company hereby agrees to fully indemnify this disposal facility against any damages resulting from this certification being inaccurate or untrue. I further certify that the company has not altered the form or content of this profile sheet as provided by Allied Waste.

Siobhan LeRay, CSR
Authorized Representative Name And Title (Printed)

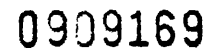
USA Environment LP
Company Name

Siobhan LeRay
Authorized Representative Signature

7/18/08
Date

VII. Allied Waste Decision

<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Rejected	Expiration: <u>10/31/08</u>
Conditions:		
<u>Keith Diamanti, Special Waste Analyst</u>	<u>[Signature]</u>	<u>7/18/08</u>
Name, Title	Signature	Date



TRANSPORTER #1

Weight 46000 92



NON-HAZARDOUS WASTE MANIFEST

0909170

1. Generator's US EPA ID Number NHNT		Manifest Document Number 0909170		2. Page 1 of 1	
3. Generator's Name and Mailing Address LDL COASTAL, L.P. 906 MARLIN FREEPORT, TX 77541				5. Generating Location (if different)	
4. Phone () 713-432-2641				6. Phone ()	
7. Transporter #1 Company Name BAYOU CITY WASTE, 10234 LUCORE ST HOU, TX			8. US EPA ID Number 77017 #8666		9. Transporter #1's Phone 713-864-8540
10. Transporter #2 Company Name			11. US EPA ID Number		12. Transporter #2's Phone
13. Designated T/S/D Facility Name and Site Address MCCARTY RD LANDFILL 5757 A OATES RD HOUSTON, TX 77078			14. US EPA ID Number		15. Facility's Phone 713-671-1550
16. Waste Shipping Name and Description			17. Allied Waste Approval # and Exp. Date		18. Containers No. Type
a. SOIL CUTTINGS			L53 Y88630 10/31/08		5 CY
b.					
c.					
d.					
21. Additional Descriptions for Materials Listed Above Job #3329-NB-009			MAIL MANIFESTS TO: USA ENVIRONMENT L.P. PO BOX 87687 HOUSTON, TEXAS 77287 ATTN: Siobhan LeRoy		
22. Special Handling Instructions and Additional Information					
23. GENERATOR'S CERTIFICATION: I certify the materials described on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.					
Printed/Typed Name JASON KETTLER			Signature <i>[Signature]</i>		Month Day Year 10 24 08
24. Transporter #1: Acknowledgement of Receipt of Materials					
Printed/Typed Name AGUSTIN GURZIAN			Signature <i>[Signature]</i>		Month Day Year 7 25 08
25. Transporter #2: Acknowledgement of Receipt of Materials					
Printed/Typed Name			Signature		Month Day Year
26. Discrepancy Indication Space					
27. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest (except as noted in Item 19)					
Printed/Typed Name ALISA			Signature <i>[Signature]</i>		Month Day Year 11 15 08

TRANSPORTER #1

ATTACHMENT C
WATER LEVEL MEASUREMENTS

July 2008 Water Level Measurements

Well ID	Date	Time	MP ¹ Elevation (ft AMSL ²)	Depth to Water (ft BMP ³)	Water Elevation (ft AMSL)
ND4MW24B	7/30/2008	1416	5.70	4.22	1.48
NG3MW25B	7/30/2008	1421	4.91	3.26	1.65
OMW27B	7/30/2008	1459	5.45	4.27	1.18
NE3MW30B	7/30/2008	1516	6.70	5.08	1.62
NE4MW31B	7/30/2008	1444	6.01	4.59	1.42
NE4MW32C	7/30/2008	1522	6.31	7.29	-0.98
NG3CPT1	7/30/2008	1424	5.79	9.41	-3.62
NE4CPT2	7/30/2008	1447	6.77	10.31	-3.54
NC2CPT3	7/30/2008	1509	5.36	11.30	-5.94
OCPT4	7/30/2008	1503	6.38	12.93	-6.55
BM-1	7/30/2008	1428	3.53	0.51	3.02
BM-2	7/30/2008	1437	3.30	1.45	1.85

Notes:

¹ MP = Measurement Point (Top of PVC well casing).

² AMSL = Above Mean Sea Level (NGVD 29).

³ BMP = Below Measurement Point.

ATTACHMENT D
GROUNDWATER SAMPLING FIELD MEASUREMENTS

Groundwater Field Parameters - July 2008 Sampling Event
Gulfco Marine Maintenance Facility

Monitoring Well ID	Measurement Date	Parameter	Result	Unit
NE4MW32C	7/31/2008	conductivity	32,871	umhos/cm
		field DO	0.32	mg/L
		ORP	-112.7	mV
		pH	7.67	
		temperature	24.6	Celcius
		turbidity	3.2	NTU
NG3CPT1	7/31/2008	conductivity	29,767	umhos/cm
		field DO	0.29	mg/L
		ORP	-108.1	mV
		pH	7.63	
		temperature	25.7	Celcius
		turbidity	4.2	NTU
NE4CPT2	7/31/2008	conductivity	30,682	umhos/cm
		field DO	0.32	mg/L
		ORP	-102.7	mV
		pH	7.48	
		temperature	25.4	Celcius
		turbidity	3.3	NTU
NC2CPT3	7/31/2008	conductivity	29,326	umhos/cm
		field DO	0.44	mg/L
		ORP	-104.3	mV
		pH	7.68	
		temperature	26.3	Celcius
		turbidity	3.3	NTU
OCPT4	7/31/2008	conductivity	28,617	umhos/cm
		field DO	0.16	mg/L
		ORP	-114.7	mV
		pH	7.58	
		temperature	26.2	Celcius
		turbidity	3.6	NTU